

August 1, 2025

Hon. Peggy Kuo **United States District Court** Eastern District of New York 225 Cadman Plaza East Brooklyn, New York 11201 VIA ECF ONLY

> Re: Shkolir, et al. v. RX2GO, Inc., et. al.; 1:23-cv-7256-OEM-PK (EDNY)

STATUS REPORT/EXTENSION REQUEST

Your Honor:

Your Honor's Order of July 22, 2025, the parties were ordered to file a revised agreement regarding their Motion for Settlement Approval by today, August 1, 2025. The Plaintiffs have all signed such an agreement and we had assurances from defense counsel that his clients were signing today as well, but we have not received it yet. Defendants did, earlier this week, provide their signatures of the previous agreement that the Court did not approve, but not the new one.

We therefore submit the new version with the Plaintiffs' signatures herewith, hopeful that Defendants will submit their signed version later this evening. In the event that does not happen, we ask that the Court order that they provide a signed version by a date certain in the very near future and that, if they do not, will nonetheless be judicially deemed to have signed the version signed by Plaintiffs. The parties had signed a binding term sheet regarding this settlement when we met in person with Your Honor several weeks ago now, and the Plaintiffs are understandably quite anxious to get this finalized.

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